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Attorneys for GREYSTONE NEVADA, LLC
and U.S. HOME CORPORATION

IN THE UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re:
GERONIMO PLUMBING, LLC

Debtor.

Lead Case: 09-14814-GWZ
Case No. 09-14820-GWZ
Chapter 11

**NOTICE OF MOTION FOR RELIEF
FROM AUTOMATIC STAY**

Hearing Date: December 8, 2016
Hearing Time: 9:30 a.m.

NOTICE IS HEREBY GIVEN that a MOTION FOR RELIEF FROM AUTOMATIC STAY was filed on November 2, 2016 by Greystone Nevada, LLC and U.S. Home Corporation (collectively "Movants"). Movants seek relief from the bankruptcy stay for the limited purpose of liquidating their claims against the Debtor (i.e., allowing the district courts to determine liability and damages) and pursuing the recovery of any available insurance proceeds from the Debtor's liability insurers. Movants have no intention of seeking recovery against the Debtor or the bankruptcy estate and, as such, seeks an order from this Court lifting the automatic stay for this limited purpose. Any opposition must be filed pursuant to Local Rule 9014(d)(1).

NOTICE IS FURTHER GIVEN that if you do not want the court to grant the relief sought in the Motion, or if you want the court to consider your views on the Motion, then you must file an opposition with the court, and serve a copy on the person making the Motion *no later than 14 days* preceding the hearing date for the motion, unless an exception applies (see Local

1 Rule 9014(d)(3)). The opposition must state your position, set forth all relevant facts and legal
2 authority, and be supported by affidavits or declarations that conform to Local Rule 9014(c).

3 **If you object to the relief requested, you *must* file a WRITTEN response to this**
4 **pleading with the court. You *must* also serve your written response on the person who**
5 **sent you this notice.**

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7 **If you do not file a written response with the court, or if you do not serve your**
8 **written response on the person who sent you this notice, then:**

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 - **The court may *refuse to allow you to speak* at the scheduled hearing; and**
 - **The court may *rule against you* without formally calling the matter at the**
- 11 **hearing.**

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13 **NOTICE IS FURTHER GIVEN** that the hearing on the said Motion will be held before a
14 United States Bankruptcy Judge, in the Foley Federal Building, 300 Las Vegas Boulevard South,
15 Third Floor, Las Vegas, Nevada 89101 on December 8, 2016, at the hour of 9:30 a.m.

16 Dated: November 2, 2016

PAYNE & FEARS LLP

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18 By /s/ Gregory H. King

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